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McCaw Cellular Communications, Inc. ("McCaw"), hereby submits its comments in support of the Report and Recommendations filed by the Unlicensed PCS Ad Hoc Committee for 2 GHz Microwave Transition and Management ("UTAM").¹ As detailed below, McCaw believes that UTAM's proposals to establish a mechanism for relocating existing microwave users and to allow for early deployment of "non-nomadic" devices and systems are encouraging developments.

In its Report, UTAM proposes the creation of a new industry "entity" to fund and manage the relocation of 2 GHz microwave licensees operating in the proposed 1910-1930 MHz unlicensed PCS band.² UTAM asserts that such an entity is required to secure financing for the relocation costs and to ensure that all beneficiaries of the spectrum clearing contribute equitably to those costs. Participation in the

¹ ("UTAM Report"); see FCC Public Notice, D.A. 93-577 (May 19, 1993).

² UTAM Report at 8-10.

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entity's funding program would be a precondition to obtaining FCC equipment authorization to market unlicensed PCS devices and systems.

UTAM's proposed rules governing the manufacture, sale and marketing of unlicensed PCS devices and systems contemplate that clearing of the entire unlicensed PCS band will ultimately be necessary. But, they would permit interim ~~deployment of certain non-terrestrial devices and systems for~~

the function of a controlled exhibit such as that

McCaw similarly supports UTAM's proposed equipment authorization rules for both nomadic and non-nomadic unlicensed PCS. Permitting the interim deployment of non-nomadic devices and systems -- subject to appropriate non-interference requirements -- before the band has been fully cleared will accelerate the introduction of that equipment in the public interest. These early installations will generate revenues to assist in funding the relocation efforts while at the same time providing valuable technical and marketing data as well as new service capabilities for users.⁷

In view of the foregoing, McCaw urges the Commission to adopt the proposals contained in the UTAM Report. They represent constructive and essential steps to making unlicensed PCS a reality. Without such initiatives and actions, the Commission cannot achieve the important public interest goal of extending new telecommunications

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UTAM Report at 17-18.

capabilities to consumers while safeguarding the interests of incumbent microwave licensees.

Respectfully submitted,

MCCAW CELLULAR
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Dated: June 21, 1993

CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of June, 1993, caused the foregoing Comments of McCaw Cellular Communications, Inc., to be served, first class postage prepaid, upon the following:

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